

1 W. DOUGLAS SPRAGUE (Cal. Bar No. 202121)  
2 DAVID JUNG (Cal. Bar No. 314508)  
3 RAINA BHATT (Cal. Bar No. 319435)  
4 COVINGTON & BURLING LLP  
5 Salesforce Tower  
6 415 Mission Street, Suite 5400  
7 San Francisco, CA 94105-2533

8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **SAN FRANCISCO DIVISION**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 TWO CONDOMINIUMS LOCATED AT 465  
15 OCEAN DRIVE, UNITS 315 AND 316,  
16 MIAMI BEACH, FLORIDA,

17 Defendant.

Case No. 21-CV-4060

**STATEMENT OF CLAIM OF ZACHARY  
APTE TO SEIZED PROPERTY  
PURSUANT TO RULE G(5) OF THE  
SUPPLEMENTAL RULES FOR  
ADMIRALTY OR MARITIME CLAIMS  
AND ASSET FORFEITURE ACTIONS**

18 ZACHARY APTE, by his counsel COVINGTON & BURLING, LLP, respectfully submits  
19 this claim to ownership of all property subject to the Government's Verified Complaint for Civil  
20 Forfeiture *In Rem* in this action. That complaint seeks the forfeiture of two condominium units:  
21 465 Ocean Drive, Unit 315, Miami Beach, Florida 33139 (Assessor's Parcel Number: 02-4203-  
22 097-0280) and 465 Ocean Drive, Unit 316, Miami Beach, Florida 33139 (Assessor's Parcel  
23 Number: 02-4203-097-0290). Compl. ¶ 1. Dr. Apte and his wife, Dr. Jessica Richman, are each  
24 fifty percent beneficiaries of a Florida land trust, known as the 465 Ocean Land Trust, dated  
25 February 4, 2020, that holds the two above-referenced properties. *See* 465 Ocean Land Trust  
26 Agreement, Ex. A. The 465 Ocean Land Trust acquired the two properties in fee simple  
27 conveyances for the benefit of Drs. Apte and Richman in real estate transactions dated February  
28

21, 2020. *See* Warranty Deed for 465 Ocean Drive, Unit 315, Miami Beach, Florida 33139, Exhibit B; Warranty Deed for 465 Ocean Drive, Unit 316, Miami Beach, Florida 33139, Exhibit C.

Dated: July 6, 2021

Respectfully,

By: /s/ W. Douglas Sprague  
W. Douglas Sprague (Cal. Bar No. 202121)  
David Jung (Cal. Bar No. 314508)  
Raina Bhatt (Cal. Bar No. 319435)

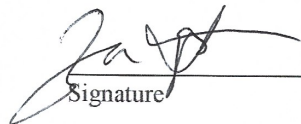
**COVINGTON & BURLING LLP**

Salesforce Tower  
415 Mission Street, Suite 5400  
San Francisco, CA 94105-2533  
Telephone: (415) 591-6000  
Facsimile: (415) 591-6091  
*wsprague@cov.com*  
*gjung@cov.com*  
*rbhatt@cov.com*

VERIFICATION

At all relevant times, pursuant to the 465 Ocean Land Trust, I have possessed and continue to possess a cognizable right, beneficial interest, and ownership interest in the two condominium units that are the subject of this forfeiture action—465 Ocean Drive, Unit 315, Miami Beach, Florida 33139 (Assessor's Parcel Number: 02-4203-097-0280) and 465 Ocean Drive, Unit 316, Miami Beach, Florida 33139 (Assessor's Parcel Number: 02-4203-097-0290)—sufficient to confer standing.

I attest and declare under penalty of perjury under the laws of the United States of America that the foregoing Statement of Claim and this Verification are true and correct to the best of my knowledge.

  
Signature

Zachary Apte  
Printed Name

7/6/2021  
Date